

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**JORGE ZAMORA-QUEZADA**

§  
§  
§  
§  
§

**Case No. 7:18-cr-00855**

---

---

**DEFENDANT'S OPPOSED MOTION TO ALLOW ENTRY OF ELECTRONIC  
DEVICES**

---

---

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant, JORGE ZAMORA-QUEZADA, in the above styled and numbered cause, and files this Opposed Motion to Allow Entry of Electronic Devices at the East Hidalgo Detention Center for use by Defendant, and would respectfully show the Court as follows:

**I.**

Defendant Jorge Zamora-Quezada hereby respectfully requests that he be allowed the following access at the East Hidalgo Detention Center in order to adequately prepare for the defense at his Sentencing hearing in this complex case:

- Allow the admittance of a laptop computer;
- Allow the admittance of a USB drive containing HIPAA protected medical records;
- Allow the admittance of hard cover books;
- Allow the admittance of notebooks containing case related material.

Defendant files this Motion not for the purpose of delay or harassment, but rather so that justice may be served.

**CERTIFICATE OF CONFERENCE**

Pursuant to S.D. Tex. Cr. LR 12.2, counsel for Jorge Zamora-Quezada conferred with Assistant United States Attorney Emily Gurskis, and she is opposed to the relief sought in this Motion.

**PRAYER**

Defendant, Jorge Zamora-Quezada, hereby respectfully requests that his Motion to Allow Entry of Electronic Devices at the East Hidalgo Detention Center be granted.

Respectfully submitted,

**MARTINEZ/TIJERINA, PLLC**

1201 East Van Buren  
Brownsville, Texas 78520  
Tel: 956-550-4868  
Fax: 956-621-0135

By: /s/ Benigno (Trey) Martinez  
BENIGNO (TREY) MARTINEZ  
State Bar No. 00797011  
Federal ID No. 23945  
E-mail: [trey@mbmtlawfirm.com](mailto:trey@mbmtlawfirm.com)  
TOMAS F. TIJERINA  
State Bar No. 24070746  
Federal ID No. 1062166  
E-mail: [ttijerina@mbmtlawfirm.com](mailto:ttijerina@mbmtlawfirm.com)

AND

**LAW OFFICE OF STEPHEN CHAHN LEE, LLC**

209 S. LaSalle St, Suite 950  
Chicago, IL, 60604  
Tel: 312-436-1790

By: /s/ Stephen Chahn Lee  
STEPHEN CHAHN LEE

State Bar No. 6331822  
Federal ID No. 4002697  
E-mail: [slee@stephenleelaw.com](mailto:slee@stephenleelaw.com)  
**COUNSEL FOR DEFENDANT  
JORGE ZAMORA-QUEZADA**

**CERTIFICATE OF SERVICE**

On September 9, 2022, this motion was served on all counsel of record via ECF.

/s/ Benigno (Trey) Martinez

Benigno (Trey) Martinez